

FILED

UNDER

SEAL

1 K. RYAN HELMICK, ESQ.
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5 UNITED STATES DISTRICT COURT

6 DISTRICT OF NEVADA

7 UNITED STATES OF AMERICA,) Case No.: 2:2:19-cr-00032-RFB-VCF
8 Plaintiff,)
9 vs.)
10 PATTI A. KERN,)
11 Defendant.)

12 **STIPULATION TO CONTINUE SENTENCING**
13 **(SIXTH REQUEST)**

14 IT IS HEREBY STIPULATED AND AGREED, by and between Jason Frierson, United
15 States Attorney, and United States Department of Justice Trial Attorneys Timothy Finley and
16 Daniel Zytnick, and K. Ryan Helmick, Esq., of the LAW OFFICE OF RYAN HELMICK, P.C.,
17 counsel for Defendant, Patti A. Kern, that the sentencing currently set for August 18, 2022, be
18 vacated and continued until approximately February 2023 by this Honorable Court.

19 This stipulation is entered into for the following reasons:

- 20 1. Counsel for the Defendant has spoken to the Defendant and the Defendant has
21 no objection to the requested continuance;
- 22 2. Counsel for the Defendant has spoken to the Government and he has no
23 objection to the requested continuance;
- 24

3. The Defendant is still cooperating with the Government and it is anticipated that her testimony may be needed for purposes of trial in *United States v. Castro, et al.*, 2:19-cr-0295-GMN-NJK, now set for September 26, 2022, and expected to last approximately three weeks;

4. Denial of this request for continuance could result in a miscarriage of justice;

5. For all of the above-stated reasons, the ends of justice would be best served by continuance of sentencing date until after the *Castro* trial is concluded;

6. This is the sixth request for a continuance of the sentencing date in this case.

DATED this 5th day of August, 2022.

Respectfully submitted,

JASON FRIERSON
United States Attorney

/s/ Timothy Finley
TIMOTHY FINLEY
DANIEL ZYTNICK
Trial Attorneys
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LAW OFFICE OF RYAN HELMICK, P.C.
Counsel for Defendant


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5 UNITED STATES DISTRICT COURT

6 DISTRICT OF NEVADA

7 UNITED STATES OF AMERICA,) Case No.: 2:2:19-cr-00032-RFB-VCF
8)
Plaintiff,)
9)
vs.)
10)
PATTI A. KERN,)
11)
Defendant.)

12 **ORDER CONTINUING SENTENCING**

13 Based on the pending stipulation of counsel, and good cause appearing therefore, the
14 court hereby finds that:

15 IT IS HEREBY ORDERED that the sentencing in the above-captioned matter currently
16 scheduled for August 18, 2022 be vacated and continued to February 20, 2023,
17 2023, at the hour of 10:00 a.m.

18
19
20 DATED this 5th day of August, 2022

21 

22 _____
23 RICHARD F. BOULWARE, II
24 United States District Judge